

REMARKS

Claim 1-6, 12-13, 34-37, and 48-51 are pending. Applicant has canceled claims 28-33, 38-47, and 52-91 to reduce the number of claims that the Examiner needs to review.

Applicant would like to thank the Examiner for his consideration during the telephone interview of May 25, 2005. During that interview, the Examiner explained his understanding of Chen. In particular, it is the Examiner's understanding that Chen describes using "annotations" for dynamic composition of a movie. Applicant respectfully submits that the Examiner's understanding is incorrect. Chen describes that "hyperlinks," rather than "annotations," are used for dynamic composition. Although annotations may contain hyperlinks, the hyperlinks of annotations, and thus annotations themselves, are not used for dynamic composition.

Chen describes a technique for dynamically composing a stream as shown, for example, by Figure 7. The main movie about the Champaign Urbana area includes a hyperlink to the "other movie" and a hyperlink to a "UIUC Engineering College and CS Dept." movie. When the main movie is being streamed and a hyperlink is encountered, a portion of the hyperlinked movie is streamed. When the hyperlinked portion has been streamed, the main movie continues to be streamed at the point after the hyperlink. Thus, the main movie and the hyperlinked portions represent a dynamically composed stream.

Chen states that "annotations describe how a certain object within a continuous media stream is related to some other object . . . a hyperlink can be made for an interesting object in a movie which leads to related information." (Chen, p. 6.) Figure 6 of Chen illustrates a hyperlink (the rectangle around the black hole) to an HTML document. Chen states that "the rectangle outlining a black hole object indicates that it is a [sic, an] anchor, and upon clicking the outline, the document it is linked to is fetched and displayed (in this case an HTML document about black holes)." (Chen, pp. 9-10.) Figure 8 of Chen illustrates how an object (i.e., an airplane) is associated with a hyperlink so that when the

object moves from frame to frame, the hyperlink is still associated with the object. Chen states:

The specification of a hyperlink for a [sic, an] object within video streams includes several parameters.

The start frame where the object appears and the object's position.

The end frame where the object exists and the object's position.

The positions of the object outline are interpolated for frames nestled in between the first and last frames specified.

(Chen, pp. 11-12.)

In short, there is nothing in Chen to suggest that annotations are used for dynamic composition of video. Indeed, Chen makes it clear that "dynamic composition of video and audio is made possible by frame addressing and hyperlinks." (Chen, p. 13.)

The Examiner has rejected claims 1-6, 12-13, 34-37, and 48-51 under 35 U.S.C. § 102(a) as being anticipated by Chen. Applicant respectfully traverses these rejections.

Each of the pending claims is directed to ordering or reordering of annotations or identifiers of annotations so that the annotations along with the media segments can be presented in the desired order. For example, claim 1 recites "graphically ordering the annotations" and "sequentially presenting the annotations along with their corresponding identified media stream segments in the desired order." Thus, the claims are directed to ordering annotations and using that ordering of the annotations to control the presentation of both the annotations and media stream segments.

Chen does not describe presenting annotations along with the corresponding media stream segments in a particular order. Rather, Chen describes that media stream segments are presented in an order, but that an annotation is only presented "upon clicking" by a user. Thus, the annotations are not sequentially presented "along with their

corresponding identified media stream segments in the desired order" as recited, for example, by claim 1.

Moreover, applicant can find nothing in Chen that describes "ordering of annotations." The Examiner points to dynamic composition and use of Chen's authoring tool as "ordering annotations." Presumably, it is the Examiner's position that creating a video that has hyperlinks to video portions of which each has an annotation is "ordering of annotations." This "ordering of annotations," however, does not control the ordering of the media stream segments as recited by the claims. Rather, it is the ordering of the media stream segments that controls the ordering of indications of annotations (e.g., a rectangle around a black hole), not vice versa. In addition, the ordering of the presentation of annotations is controlled by a user "upon clicking" on an indication of an annotation.

Based upon the above amendments and remarks, applicant respectfully requests reconsideration of this application and its early allowance. If the Examiner has any questions or believes a telephone conference would expedite prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8548.

Dated: June 14, 2005

Respectfully submitted,

By Maurice J. Pirio
Maurice J. Pirio

Registration No.: 33,273
PERKINS COIE LLP
P.O. Box 1247
Seattle, Washington 98111-1247
(206) 359-8000
(206) 359-7198 (Fax)
Attorneys for Applicant